

LAW OFFICE OF
Jacob Barclay Mitchell, Esq.
225 Broadway, Suite 2815
New York, New York 10007

TELEPHONE: (212) 204-2574

E-MAIL: jacobbarclaymitchell@gmail.com

October 21, 2020

Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

RE: United States v. Constantinescu
19 Cr. 651 (LTS)

Dear Judge Swain,

I represent Ionela Constantinescu in the above referenced-matter. Ionela has secured a job as a driver for a transportation company. I write to request permission for Ms. Constantinescu to travel to New Jersey for work on October 23, 2020 specifically and generally for any future jobs that require her to do so. In the event Your Honor approves this modification of conditions, Ms. Constantinescu would notify her pretrial services officer when she would be traveling to and from New Jersey.

I communicated with her pretrial services officer, Rena Bolin and with the government in regards to this request. The government has no objection. Ms. Bolin has no objection.

Thank you for your consideration.

Respectfully,

_____/S/_____
Jacob Mitchell
Ezra Spilke
Counsel for Ionela Constantinescu

The requested modification is granted. DE#355
resolved.
SO ORDERED.
10/21/2020
Laura Taylor Swain, USDJ

